

JAG:CAC

**M-10-852**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

GABRIEL PAUL SINGH,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

REBECCA L. GOLDSTEIN, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 24, 2010, within the Eastern District of New York and elsewhere, defendant GABRIEL PAUL SINGH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

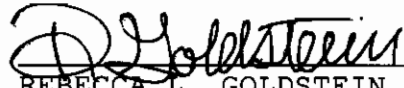
1. At approximately 4:06 p.m. on July 24, 2010, defendant GABRIEL PAUL SINGH arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines, flight number 522 from Guyana.

2. During a routine Customs and Border Protection ("CBP") exam, the defendant GABRIEL PAUL SINGH was referred to secondary inspection due to an outstanding warrant for his arrest from Pennsylvania. During secondary inspection, the defendant claimed ownership of two roller suitcases and stated that he had packed them himself. Upon examining the suitcases, the CBP officer noticed that the bottom of both suitcases were unusually thick.

3. The CBP officer then probed the bottom of both suitcases and discovered a white powdery substance in each. The substance from both suitcases field-tested positive for the presence of cocaine. At that point, the defendant GABRIEL PAUL SINGH was placed under arrest.


4. The total approximate gross weight of the cocaine found in defendant GABRIEL PAUL SINGH's suitcase is 7,148.7 grams.

WHEREFORE, your deponent respectfully requests that  
defendant GABRIEL PAUL SINGH be dealt with according to law.

A handwritten signature in black ink, appearing to read "R. Goldstein", is written over a horizontal line.

REBECCA L. GOLDSTEIN  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
26th day of July, 2010

  
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